

U.S. Securities and Exchange Commission
110 F Street. N.E. Washington D.C. 20549

8 August 2017

Dear Sir or Madam:

SEC Petition File Number 4-711

The Human Capital Management Coalition Rulemaking petition to require issuers to disclose information about their human capital management policies, practices and performance

I write as Managing Partner of Organizational Maturity Services LLP (OMS), an organisation that serves investors, corporations and other stakeholders in providing ratings and advice in the areas of corporate governance, company culture and human capital management. We are accredited by and work under the auspices and quality assurance of the [Maturity Institute](#) (MI).

Firstly, we greatly welcome this petition from the HCM Coalition members, which makes a clear statement that companies must address this material omission from their reporting. It is now evident that sustained value arises from the alignment of company purpose with the entirety of its human systems; while conversely, misalignment leads to the corporate failures we see on a regular basis. This petition represents a significant opportunity but a clear message that this situation is no longer tenable if we truly want corporations to both serve society and provide the best value to all their stakeholders.

We already provide comparative ratings of corporate governance, company culture and human capital management that sit alongside traditional credit ratings as forward-looking indicators of organizational health and long-term value. However, company specific insight and evidence to aid the determination of such ratings remains inconsistent and largely incoherent.

We attach as part of this submission our OM30 instrument, the questions contained within which, we use to determine our ratings. In obtaining information to determine our ratings, each of our questions are designed to:

- Causally link to material value or risk arising within a corporation
- Work together as a whole system diagnostic instrument of organisational health
- Assist organisations in developing strategies to improve governance, culture and human capital management and improve [Total Stakeholder Value](#) (TSV)

Our OM30 is freely available on an open source basis under a shared IP protocol agreement with MI (see: <http://www.hrmaturity.com/ihrm-events-201314/omindex-shared-ip-protocol-sip/>). The OM30 has also now been adopted by MI as one of its global standards.

In issuing guidance and regulations with respect to human capital reporting, we propose that the SEC recognise the existence of OM30 as an existing global standard already in use to assist organisations in the reporting of human capital. We believe this standard is unique and our experience in this field demonstrates that the use of this instrument is critical to value creation and the management of risk, which impacts corporations, stakeholders and wider society.

I would be happy to answer any questions or provide further information upon request.

Yours faithfully

Stuart Woollard
Managing Partner
Organizational Maturity Services LLP

Attachment: OM30 Instrument